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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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MAY 29 1998

OFFICE OF THE CLERK

In the Matter of)

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Federal-State Joint Board on)

)

Universal Service.)

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CC Docket No. 96-45

CC Docket No. 97-160

DA 98-71

REPLY COMMENTS OF SPRINT CORPORATION

On May 15, 1998, 41 parties filed comments in this matter in an effort to persuade the Commission to adopt their views regarding the appropriate methodology for determining universal service support. In spite of the number of individual filings, what have emerged are two basic ideologies.

The first is grounded in the spirit and letter of the Telecommunications Act of 1996,¹ particularly Title II, Part II, entitled "Development of Competitive Markets." More specifically, this group relies on the direction offered in Section 254 of the Act, which delineates basic principles for the preservation of universal service in a competitive environment. The second group is dedicated to maintaining the status quo. While giving lip service to the notion of competition, this group ignores, and in some cases rejects, the economic realities of creating a competitive marketplace, preferring instead to craft a universal service support

¹ Telecommunications Act of 1996, Pub. L. 104-104.

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mechanism by starting with the answer they desire (a small fund, for example) and working backwards.

Sprint firmly believes that, when drafting Section 254, Congress recognized that nurturing the status quo would not allow competition to take hold. The status quo is built upon a foundation of implicit subsidies. Competition and implicit subsidies are natural enemies and thus, as long as these subsidies are permitted to exist, they will ensure that competition does not flourish. Consequently, Section 254(d) is clear in its direction to the Commission to make carrier contributions to the universal service support explicit. It is based on this direction that Sprint advocates – as it believes the Act requires – the replacement of all implicit subsidies.

Some commenters disagree with Sprint's assertion that implicit subsidies must be eliminated, arguing that the Act does not mandate that *all* implicit subsidies are made explicit, but only those tied directly to universal service funding.² These entities attempt to compartmentalize universal service and ignore the fact that universal service, access reform, and local competition are inextricably bound. Subsidies built into local rates, vertical features, and access charges are used to support today's universal service fund and to keep residential rates artificially low. Addressing only one portion of this trilogy will not advance competition; comprehensive reform must take place.

² See, for example, comments of California Public Utilities Commission at p. 11; Bell Atlantic at p. 12; Rural Telephone Coalition at pp. 15-17.

Moreover, Section 253 of the Act bars states from taking any action that would serve as a barrier to competitors trying to enter the marketplace. Maintaining a regulatory scheme based on residual ratemaking, with its inherent reliance on implicit subsidies, unarguably erects such a barrier. Sprint has consistently supported rate re-balancing and continues to urge state regulators to take this necessary step. In the meantime, both state regulators and the Commission must make subsidies explicit – as required by Section 254.³ With respect to the federal fund being discussed here, that means addressing the implicit subsidies residing in interstate access charges.

Not only does Section 254 prohibit funding universal support through hidden subsidies, it also mandates that all carriers contributing to the fund shall do so on an equitable and nondiscriminatory basis – in other words, the funding mechanism must be competitively neutral in its application. Sprint asserts that this portion of Section 254 requires competitive neutrality in the manner in which contributions are assessed as well as the manner in which contributions are recovered. Consequently, it is Sprint's opinion that Section 254 proscribes the adoption of those plans that call for contributions to be based on interstate revenues only⁴ (since IXCs would bear an disproportionate share of the funding


³ Section 254 (d) states, in relevant part, that "Every telecommunications carrier that provides interstate telecommunications services shall contribute, on an equitable and nondiscriminatory basis, to the specific, predictable, and sufficient mechanisms established by the Commission to preserve and advance universal service."

⁴ See, for example, comments of Ameritech at p. 5; Bell Atlantic at pp. 13-14; SBC at pp. 5-6; California Public Utilities Commission at p. 6; Maryland Public Service Commission at p. 8.

burden) or those plans that would allow one segment of the industry to recover its contributions from carriers while another would be forced to seek recovery from end user customers.

The law, rather than individual agendas, should be viewed as the Commission's best and most trusted guide in this matter. The law tells us that universal service support must be equitable, specific, predictable, and sufficient. The Commission's plan can easily conform to these standards if it is based on forward looking costs; provides for a national fund based on both intrastate and interstate retail revenues; establishes a federal benchmark to serve as the maximum affordable local service rate; is revenue neutral at its inception; and provides for carrier recovery through a surcharge on all retail services from end user customers.

Respectfully submitted,
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CERTIFICATE OF SERVICE

I, Melinda L. Mills, hereby certify that I have on this 29th day of May 1998, served via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Reply Comments of Sprint Corporation" in the Matter of Federal-State Joint Board on Universal Service, CC Docket Nos. 96-45, 97-160, DA 98-71, filed this date with the Secretary, Federal Communications Commission, to the persons on the attached service list.



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